



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS
F. #2021R000184

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 28, 2022

By ECF

The Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Derrick Taylor
Criminal Number 22-311 (LDH)

Dear Judge Kuo:

The government respectfully submits this letter in opposition to the defendant's letter filed on July 27, 2022 concerning proposed conditions of pretrial release. In his letter, the defendant seeks to maintain the conditions of release imposed by a U.S. Magistrate Judge Douglas F. McCormick of the Central District of California, which in relevant part includes a \$25,000 unsecured bond and permission for the defendant to maintain possession of his firearms. The defendant's arraignment before this Court on the indictment in the above-referenced matter is scheduled for tomorrow at 2 p.m.

By way of background, the defendant was arrested pursuant to a criminal complaint in the Central District of California, had his initial appearance in the U.S. District Court for the Central District of California, and has since been indicted in this district in the above-referenced matter.

As articulated by then-U.S. Magistrate Judge Gary Brown, "Case law unambiguously provides that greater deference must be given to detention determinations in the charging district, and, conversely, far less weight should be accorded to the determinations rendered in the district of arrest." United States v. Savader, 944 F. Supp. 2d 209, 213 (E.D.N.Y. 2013).

Here, the Court should adopt the recommendations of the government to increase the amount of the bond to \$100,000 and to surrender his firearms for the following reasons: (1) the defendant has now been indicted on the charges and faces up to 25 years' imprisonment; (2) the charges against the defendant are supported by substantial evidence,

including voice recordings of his conversations with a co-conspirator who was acting at the direction of the government; and (3) magistrate judges in this district have authorized the pretrial release of codefendants in this case pursuant to much more substantial bonds than that currently in place for this defendant (Fan Liu on a \$1 million bond with \$30,000 cash bail, Matthew Ziburis on a \$500,000 bond, and Craig Miller on a \$100,000 bond). While the defendant claims that he needs his firearms for his work as a private investigator, codefendant Miller is a federal law enforcement agent who similarly needs firearms for his work, and U.S. Magistrate Judge Vera M. Scanlon has ordered that Miller surrender his weapons. Further, upon a conviction on either charge in this case, the defendant will be ineligible to possess a firearm.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Alexander A. Solomon
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cc: Defense counsel (by ECF)
Clerk of the Court (by ECF)